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STATE OF CALIFORNIA—HEALTH AND HUMAN SERVICES AGENCY
DEPARTMENT OF SOCIAL SERVICES
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EDMUND G. BROWN JR.
GOVERNOR

December 8, 2016

Daniel Nelson, Director
Santa Barbara Social Services Department
234 Camino del Rosario
Santa Barbara, CA 93110

Dear Mr. Nelson:

I want to take this opportunity to thank you and your staff for the cooperation and assistance provided to the reviewer from our office during the course of the Civil Rights Compliance Review of March 28 through April 1, 2016. Enclosed is the final report on the review.

There are some compliance issues (deficiencies) identified in the report, which will require the development of a Corrective Action Plan (CAP). Please submit your CAP within 60 days of this letter. Please address each deficiency and include steps and time lines for the completion of all corrective actions and recommendations listed in the enclosed report.

Please submit your CAP in both hardcopy and, in an effort to comply with ADA website accessibility, we also require the CAP to be submitted electronically as a Word document via email at crb@dss.ca.gov.

We will provide a copy of your report to any individual who makes a valid Public Records Act (PRA) request. Our reports are considered public documents under the PRA. Once we approve your CAP, it becomes a public document as well. In addition, these documents are published on our website at <http://www.cdss.ca.gov/civilrights/PG2890.htm>.

If you need technical assistance in the development of your CAP, please feel free to contact Jaime Urquizo at (916) 654-2101. You may also contact him by e-mail at james.urquizo@dss.ca.gov.

Sincerely,

Original signed by Jim Tashima

JIM TASHIMA, Chief
Civil Rights Bureau
Human Rights and Community Services Division

Enclosure

c: Kim McCoy Wade, Chief
CalFresh Policy Bureau

Carlos Ocampo, Chief
Field Operations Bureau

Tami Gutierrez, Chief
CalFresh Management Operations Section

Paul Gardes
CalFresh Policy Bureau

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State Refugee Coordinator

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**CIVIL RIGHTS COMPLIANCE REVIEW REPORT
FOR
SANTA BARBARA SOCIAL SERVICES
DEPARTMENT
Conducted on
March 28, 2016 through April 1, 2016**

**California Department of Social Services
Human Rights and Community Services Division
Civil Rights Bureau
744 P Street, M.S. 8-16-70
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Reviewer: Jaime Urquizo

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CIVIL RIGHTS COMPLIANCE REVIEW REPORT

I. INTRODUCTION

The purpose of this review by the California Department of Social Services (CDSS) Civil Rights Bureau (CRB) staff was to assess the Santa Barbara Social Services Department with regard to its compliance with CDSS Manual of Policies and Procedures (MPP) Division 21 Regulations, and other applicable state and federal civil rights laws.

An on-site compliance review was conducted on March 28 through April 1, 2016. An exit interview was held on April 1, 2016, to review the preliminary findings.

The review was conducted in the following locations:

Name of Facility	Address	Programs	Non-English languages spoken by a substantial number of clients (5% or more)
Santa Maria	2125 Centerpointe Parkway, Santa Maria, CA	Calworks, Children Services, State Appeals	English, Spanish
Santa Maria	1444 South Broadway, Santa Maria, CA	Calworks, State Appeals	English, Spanish
Santa Barbara	234 Camino Del Remedio, Santa Barbara, CA	Calworks, Calfresh, Children Services	English, Spanish
Lompoc	1100 West Laurel Avenue, Lompoc, CA	Calworks, Children Services, State Appeals	English, Spanish

II. SUMMARY OF METHODOLOGY

In preparing for this review, CDSS staff completed the following tasks:

- Reviewed the 2016 Civil Rights Compliance Plan submitted by the County.
- Reviewed the civil rights discrimination complaint database for a complete listing of complaints filed against the County for the last year.
- Reviewed the previous Compliance Reviews and Corrective Action Plans submitted by the county.

Headquarters and on-site review procedures included:

- Interviews of public contact staff
- Survey of program managers
- Case file reviews
- Facility inspections
- Discussion with community advocate groups.
(In this review the following organization(s) were contacted for feedback.)
 - Santa Barbara County Education Office Health Linkages
Tara L Dooley
Program Health Initiative of Santa Barbara
 - Santa Ynez People Helping People
Aracelia Sencion
Solvang, CA
- NOTE: These organizations did not have any observations.

Each site/program was reviewed for compliance in the following areas:

- Dissemination of Information
- Facility Accessibility for Individuals with Disabilities
- Bilingual Staffing/Services for Non-English-Speaking Clients
- Accessibility for Clients with Visual or Hearing Impairments
- Documentation of Client Case Records
- Staff Development and Training
- Discrimination Complaint Procedures

Here is a summary of the sources of information used for the review:

Interviews Conducted of Public Contact Staff

Classifications	Total	Bilingual
Eligibility Workers	24	20
Children Social Workers	8	6
Receptionist/Screeners	8	8
Total	40	34

Program Manager Surveys

Number of surveys distributed	4
Number of surveys received	4

Reviewed Case Files

Languages of clients' cases (English, Spanish)	Calworks Cases	Calfresh Food Stamp Cases	Fraud Cases	Children Services Cases	Appeals Cases	TOTAL
English speakers' case files reviewed	5	14	6	5	4	34
Non-English or limited-English speakers' case files reviewed (Spanish)	21	17	4	25	6	73

Sections III through VIII of this report contain specific Division 21 civil rights requirements and present field review findings regarding the county's compliance with each requirement. The report format first summarizes each requirement, then the actual review team findings, including appropriate comparisons. This format is an effort to validate the application of policies and procedures contained in the annual plan. Required corrective actions are stated at the end of each section.

Section IX reviews the county's compliance plan, and provides either approval of the plan as submitted, or lays out additional information to be submitted to gain approval.

Section X highlights issues pointed out by Community Input and summarizes Reviewer Observations.

Section XI of the report is reserved for a declaration of overall compliance.

III. DISSEMINATION OF INFORMATION

Counties are required to disseminate information about program or program changes and about how applicants and recipients are protected by the CDSS regulations (Division 21). This dissemination should occur through outreach and information to all applicants, recipients, community organizations, and other interested persons, including non- and limited-English speakers and those with impaired hearing or vision or other disabling conditions.

A. Findings

Access to Services, Information and Outreach	Yes	No	Some-times	Comments
Does the county accommodate working clients by flexing their hours or allowing applications to be mailed in?	Yes			
Does the county have extended hours to accommodate clients?	Yes			
Can applicants access services when they cannot go to the office?	Yes			
Does the county ensure the awareness of available services for individuals in remote areas?	Yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Does the county use the CDSS pamphlet "Your Rights Under California Welfare Programs" (Pub 13 – 6/11)?	Yes			
Is the pamphlet distributed and explained to each client at intake and re-certification?	Yes			

Signage, posters, pamphlets	Yes	No	Some-times	Comments
Is the current version of Pub 13 available in Arabic, Armenian Cambodian, Chinese, English, Farsi Hmong, Japanese, Korean, Lao Mien, Portuguese, Punjabi, Russian Spanish, Tagalog, Ukranian, Vietnamese?	Yes			
If the PUB 13 is not displayed in all the languages available, is there a poster that indicates that the Pub 13 is available in all 18 languages?	Yes			
Was the Pub 13 available in large print (English and Spanish), audiocassette and Braille?	Yes			
Were the current versions of the required posters present in the lobbies?	Yes			
Did the workers know the location of the required posters with the Civil Rights Coordinator's name and address?	Yes			
Were there instructional and directional signs posted in waiting areas and other places frequented by a substantial number of non-English-speaking clients translated into appropriate languages?	Yes			

B. Corrective Actions
None

C. Recommendations
None

IV. FACILITY ACCESSIBILITY FOR INDIVIDUALS WITH DISABILITIES

The Americans with Disabilities Act (ADA) requires public accommodations to provide goods and services to people with disabilities on an equal basis with the rest of the general public. The goal is to afford every individual the opportunity to benefit from the services available. The federal regulations require that architectural and communication barriers that are structural must be removed in public areas of existing facilities when their removal is readily achievable; in other words, easily accomplished and able to be carried out without much difficulty or expense.

The facility review is based on four priorities supported by the ADA regulations for planning achievable barrier removal projects. The priorities include ensuring accessible approach and entrance to the facility, access to goods and services, access to restrooms, and any other measures necessary.

Note that the references to the Americans with Disabilities Act Accessibility Guidelines (ADAAG) in the Corrective Action column refer to the federal Standards for Design. Title 24 of California Code and Regulations (T24 CCR) is also cited because there are instances when California state law is stricter than ADAAG specifications.

The county must ensure that programs and activities are readily accessible to individuals with disabilities. This includes building accessibility and availability of accessible parking as well as accessibility of public telephones and restrooms.

Regulations cited are from the Title 24, California Code of Regulations (T24 CCR) and ADAAG.

A. Findings and Corrective Actions

1. Facility Location: Monday – 234 Camino Del Remedio, Santa Barbara

Facility Element	Findings	Corrective Action
Parking	<p>Unauthorized parking sign needed at entry to parking lot from cul-de-sac entry.</p> <p>Sign is unreadable.</p>	<p>An additional sign shall be posted in a conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space.</p> <p>The sign shall be 17" by 22" min. in size with lettering 1" min high, stating:</p> <p>"Unauthorized vehicles parked in designated accessible spaces"</p>

		<p>not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at ____ or by telephoning _____."</p> <p>Blank spaces are to be filled in with appropriate information as a permanent part of the sign.</p> <p>(CA T24 1129B.4) p 134</p>
Parking	All Disabled parking and access aisle lines are not readily visible.	<p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36" wide x 36" high.</p> <p>(CA T24 11B-502.6.4.1) pg. 169</p> <p>The parking space shall be marked with an International Symbol of Accessibility ...in white or a suitable contrasting color</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p> <p>The centerline of the International Symbol of Accessibility shall be a max. of 6" from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p>
Parking	One Disable parking sign had incorrect language	<p>Each parking space for persons with disabilities shall be identified by a reflectorized sign permanently posted adjacent to</p>

		<p>and visible from each stall or space, consisting of the International Symbol of Accessibility in white on dark blue background.</p> <p>(CA T24 1129B.4) (ADA 4.6.4) p 134</p> <p>When in a path of travel, sign shall be posted at a height of 80" min. from the bottom of the sign to the finished grade.</p> <p>(CA T24 1129B. 4) (ADA 4.6.4) p 134</p> <p>An additional sign or additional language below the symbol sign of accessibility shall state</p> <p>"Minimum Fine \$250" (CA T24 1129B.4) p 134</p>
Parking	<p>The Disabled Parking Area parking access aisle had a ramp that intruded into the asphalt parking area.</p> <p>The edges of the sidewalk also protruded into the access aisle.</p>	<p>Access aisles shall not overlap the vehicular way.</p> <p>(CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p> <p>Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces or parking access aisles.</p> <p>Fig. 5 (CA T24 11B-406.5.1) (ADA 406.5) pg. 196</p>
Posters: And Justice for All (# 475B)	The CRCs name was not visible. Lettering was too small.	Current: 12/99

Everyone is Different, but Equal under the Law (PUB 86)		03/07, with current CRC information (Div 21-107.211)
Women's Bathroom	Two of three water basin pipes underneath were not wrapped with correct insulated protective layer. (1 st floor bathroom)	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>
Women's Bathroom	Three of three water basin pipes underneath were not wrapped with correct insulated protective layer. (2nd floor bathroom)	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>
Client Interview Rooms and Booths	Disabled identified client interview room did not have the required turnaround of 5' clearance for person in a wheelchair. Clearance was at 32"	<p>Wheelchair Turning Space is a minimum space for a wheelchair to turn 180 degrees in a 60" diameter or T-shaped space.</p> <p>(CA T24 1118B.3, ADA 4.2.3) p 236</p>

2. Facility Location: Tuesday – 2125 S. Centerpointe Prkwy, Santa Maria, CA

Facility Element	Findings	Corrective Action
Main or Alternate Entrance: Accessible signage	A sign with the international symbol of accessibility was not visible.	A sign with the international symbol of accessibility shall be at every primary entrance and every major junction indicating the direction along or to accessible features. (CA T24 1127B.3, ADA 4.1.3(16B), CA T24 1117B.5.1) pp 186, 394
Elevator	International Symbol of Accessibility was missing	Entrances that are accessible to and usable by persons with disabilities are identified with at least 1 International Symbol of Accessibility. Additional directional signs using the symbol are visible along approaching pedestrian ways. (CA T24 1117.B.5.8.1.2) p 251
Posters: Everyone is Different, but Equal under the Law (PUB 86)	Contact Information for the CRC was not clearly visible. The lettering was too small.	Current: 12/99 03/07, with current CRC information (Div 21-107.211)

3. Facility Location: Wednesday – 1444 S. Broadway, Santa Maria

<p>Parking</p>	<p>All Disabled parking and access aisle lines are not readily visible.</p>	<p>The parking space shall be marked with an International Symbol of Accessibility...in white on a blue background - a minimum 36" wide x 36" high.</p> <p>(CA T24 11B-502.6.4.1) pg. 169</p> <p>The parking space shall be marked with an International Symbol of Accessibility ...in white or a suitable contrasting color</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p> <p>The centerline of the International Symbol of Accessibility shall be a max. of 6" from the centerline of the parking space, its sides parallel to the length of the parking space and its lower corner at, or lower side aligned with, the end of the parking space length.</p> <p>(CA T24 11B-502.6.4.2) pg. 169</p>
<p>Parking</p>	<p>All Disabled parking spots need to be connected with accessible aisles to the front sidewalk of the building. There were no accessible aisles leading to the front of the building.</p>	<p>Access aisles (load and unload) must connect to the accessible path of travel, including curb cuts or ramps as needed.</p> <p>(CA T24 1129B.3.3, ADA 4.6.3) p 135</p>

		<p>Walkways minimum 48".</p> <p>(CA T24 1133B.7.1) p 160</p> <p>Located on shortest accessible route.</p> <p>CA T24 1129B.1.4, ADA 4.6.2(1)) p 134</p> <p>Walks and sidewalks subject to these regulations shall have a continuous surface, not interrupted by steps or by abrupt changes in level exceeding ½ inch and shall be a minimum of 48" in width. Surfaces shall be slip resistant.</p> <p>(CA T24 1133B.7.1, ADA 4.3.8) p 163</p>
Men's Bathroom	<p>One water basin pipe underneath water basin was not wrapped with correct insulated protective layer.</p>	<p>Water supply and drain pipes under lavatories and sinks shall be insulated or otherwise configured to protect against contact.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p> <p>There shall be no sharp or abrasive surfaces under lavatories and sinks.</p> <p>(CA T24 11B-606.5) (ADA 606.5) pg. 330</p>

3A. Workforce Resource Center (Call Center) – 1410 S. Broadway, Santa Maria, CA

- The Call Center was visited and found to be operating at an extremely professional manner. Calls were taken expeditiously and any translation or language considerations were being handled accordingly.

4. Facility Location: Thursday -- 1100 West Laurel Avenue, Lompoc, CA

Facility Element	Findings	Corrective Action
Parking	The Disabled Parking Area had one parking access aisle that had a ramp intruding into the asphalt parking area.	<p>Access aisles shall not overlap the vehicular way.</p> <p>(CA T24 11B-502.3.4) (ADA 502.3.4) pg. 176</p> <p>Curb ramps and the flared sides of curb ramps shall be located so that they do not project into vehicular traffic lanes, parking spaces or parking access aisles.</p> <p>Fig. 5 (CA T24 11B-406.5.1) (ADA 406.5) pg. 196</p>
Parking: Accessible space minimum: 9' wide, 18' long, 5' access?	Two accessible parking spots were short in length at 17'	<p>Length of parking space shall be at least 18' long, 9' wide.</p> <p>(CA T24 1129B.3.1, ADA 4.6.3) p 135</p> <p>Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces.</p> <p>(CA T24 1129B.3.1) (ADA 4.6.3)</p>

<p>Parking: Is there unauthorized parking signage at entrance to off-street accessible parking?</p>	<p>Unauthorized parking signage at entrance to off-street is 12" from the ground and is not visible</p>	<p>Additional sign shall be posted in conspicuous place at entrances to off-street parking facilities, or adjacent to and visible from each space. Sign shall be 17" by 22" min. in size with lettering 1" min. high, stating: "Unauthorized vehicles parked in designated accessible spaces not displaying distinguishing placards or license plates issued for persons with disabilities may be towed away at owner's expense. Towed vehicles may be reclaimed at _____ or by telephoning _____."</p> <p>(CA T24 1129B.5) p 133</p> <p>The sign shall be 70 sp. in. min. and, when in a path of travel, shall be posted at a height of 80" min. from the bottom of the sign to the finished grade.</p> <p>(CA T24 1129B.) (ADA4.6.4) p133</p>
<p>Parking: Accessible space minimum: 9' wide, 18' long, 5' access?</p>	<p>Accessible parking spot lines are not painted on the parking area.</p>	<p>Length of parking space shall be at least 18' long, 9' wide.</p> <p>(CA T24 1129B.3.1, ADA 4.6.3) p 135</p> <p>Access aisles should be located on the passenger side of a space, and should be a min. of 18' long by 5" wide for aisles, serving car accessible spaces, and a min. 18' by 8' wide for aisles serving van accessible spaces. (CA T24 1129B.3.1) (ADA 4.6.3)</p>

V. PROVISION FOR SERVICES TO APPLICANTS AND RECIPIENTS WHO ARE NON-ENGLISH-SPEAKING OR WHO HAVE DISABILITIES

Counties are required by Division 21 to ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English-speaking population and individuals with disabilities without undue delays. Counties are required to collect data on primary language and ethnic origin of applicants/recipients (identification of primary language must be done by the applicant/recipient).

Using this information, a county may determine 1) the number of public contact staff necessary to provide bilingual services, 2) the manner in which they can best provide interpreter services without bilingual staff and 3) the language needs of individual applicants/recipients. Counties must employ an appropriate number of certified bilingual public contact employees in each program and/or location that serves a substantial number of non-English-speaking persons. In offices where bilingual staff are not required because non-English-speaking persons do not represent a substantial number, counties must provide effective bilingual services through interpreter or other means.

Counties must also provide auxiliary aids and services, including Braille material, taped text, qualified interpreters, large print materials, telecommunication devices for the deaf (TDD's), and other effective aids and services for persons with impaired hearing, speech, vision or manual skills. In addition, they must ensure that written materials be available in individuals' primary languages when the forms and materials are provided by CDSS, and that information inserted in notices of action (NOA) be in the individuals' primary language.

A. Findings from Program Manager Surveys, Staff Interviews and Case File Reviews

Question	Yes	No	Some-times	Comments
Does the county identify a client's language need upon first contact? How?	Yes			
Does the county use a primary language form?	Yes			
Does the client self-declare on this form?	Yes			
Are non-English- or limited- English-speaking	Yes			

Question	Yes	No	Some-times	Comments
clients provided bilingual services?				
After it has been determined that the client is limited-English or non-English speaking, is there a county process for procuring an interpreter?	Yes			
Is there a delay in providing services?		No		
Does the county have a language line provider, a county interpreter list, or any other interpreter process?	Yes			
Are county interpreters determined to be competent?	Yes			
Does the county have adequate interpreter services?	Yes			
Does the county allow minors to be interpreters? If so, under what circumstances?	Yes			
Does the county allow the client to provide his or her own interpreter?	Yes			The County will allow and documentation is evident.
Does the county ensure that the client-provided interpreter understands what is being interpreted for the client?	Yes			

Question	Yes	No	Some-times	Comments
Does the county use the CDSS-translated forms in the clients' primary languages?	Yes			
Is the information that is to be inserted into NOA translated into the client's primary language?	Yes			
Does the county provide auxiliary aids and services, TDD's and other effective aids and services for persons with impaired hearing, speech, vision or manual skills, including Braille material, taped text, large print materials (besides the Pub 13)?	Yes			
Does the county identify a client with a disability (physical, mental, or learning)?	Yes			
Does the county provide reasonable accommodations to clients with a disability (physical, mental, or learning)?	Yes			
Does the county identify and assist the client who has learning disabilities or a client who cannot read or write?	Yes			

Question	Yes	No	Some-times	Comments
Does the county offer screening for learning disabilities?	Yes			
Is there an established process for offering screening?	Yes			
Is the client identified as having a learning disability referred for evaluation?	Yes			

B. Corrective Actions

None

VI. DOCUMENTATION OF APPLICANT/RECIPIENT CASE RECORDS

Counties are required to ensure that case records document applicant's/recipient's ethnic origin and primary language, the method used to provide bilingual services, information that identifies an applicant/recipient as disabled, and an applicant's/recipient's request for auxiliary aids and services.

A. Findings from Case File Reviews and Staff Interviews

Documented Item	CalWorks	Calfresh	Children Services
Ethnic origin documentation	Santa Barbara County is clearly identifying client Ethnicity on record	Santa Barbara County is clearly identifying client Ethnicity on record	Santa Barbara County is clearly identifying client Ethnicity on record
Primary language documentation	Santa Barbara County is clearly identifying a clients Primary Language on record	Santa Barbara is clearly identifying a clients Primary Language on record	Santa Barbara is clearly identifying a clients Primary Language on record

Documented Item	CalWorks	Calfresh	Children Services
Method of providing bilingual services and documentation	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.	At intake clients are queried on language preferences and assigned a bilingual worker.
Client provided own interpreter	A client is advised on the usage of client provided interpreter and it is documented.	A client is advised on the usage of client provided interpreter and it is documented.	A client is advised on the usage of client provided interpreter and it is documented.
Method to inform client of potential problem using own interpreter	As a client is processed at intake they are advise as to the potential problems with the proving their own interpreter and its documented.	As a client is processed at intake they are advise as to the potential problems with the proving their own interpreter and its documented.	As a client is processed at intake they are advise as to the potential problems with the proving their own interpreter and its documented.
Individual's acceptance or refusal of written material offered in primary language	When a client refuses written material offered in their language – it is documented.	When a client refuses written material offered in their language – it is documented.	When a client refuses written material offered in their language – it is documented.
Documentation of minor used as interpreter	If a minor is used as an interpreter – it is being documented.	If a minor is used as an interpreter – it is being documented.	If a minor is used as an interpreter – it is being documented.
Documentation of circumstances for using minor interpreter temporarily	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.	If a minor is used as an interpreter – it is being documented. Circumstances why needed is also documented.

Documented Item	CalWorks	Calfresh	Children Services
Method of identifying client's disability	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.	At intake a client is asking about any special accommodations needed. At intake a form is used to identify a client's disability.

B. Corrective Actions
None

VII. STAFF DEVELOPMENT AND TRAINING

Counties are required to provide civil rights and cultural awareness training for all public contact employees, including familiarization with the discrimination complaint process and all other requirements of Division 21. The training should be included in orientation, as well as the continuing training programs.

A. Findings

Interview questions	Yes	No	Some-times	Comments
Do employees receive continued Division 21 Training?	Yes			
Do employees understand the county policy regarding a client's rights and procedure to file a discrimination complaint?	Yes			
Does the county provide employees Cultural Awareness Training?	Yes			
Do the CSW's have an understanding of MEPA (Multi-Ethnic Placement Act)?	Yes			

Do the employees seem knowledgeable about the predominant cultural groups receiving services in their area?	Yes			
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A. Corrective Actions
None

VIII. DISCRIMINATION COMPLAINT PROCEDURES

Counties are required to maintain a process for addressing all complaints of discrimination. They must track complaints of discrimination through the use of a control log in which all relevant information is kept, including when the complaint was received, the name of the complainant, identifying numbers and programs, basis of discrimination, and resolution. It is usually the Civil Rights Coordinator responsibility to maintain this log.

A. Findings from Staff Interviews and Program Manager Surveys

Interview and review areas	Yes	No	Some-times	Findings
Can the employees easily identify the difference between a program, discrimination, and a personnel complaint?	Yes			
Did the employees know who the Civil Rights Coordinator is?	Yes			
Did the employees know the location of the Civil Rights poster showing where the clients can file a discrimination complaint?	Yes			

Interview and review areas	Yes	No	Some-times	Findings
When reviewing the complaint log with the Civil Rights Coordinator, was it complete and up to date?	Yes			
Is the County utilizing correct correspondence to address the final results to the complainant after the investigation is completed?	Yes			

C. Corrective Action
None

IX. COMMUNITY INPUT

As a part of this review, and as noted in Section II, feedback was sought from community and advocate groups. The following summarizes their observations, and will provide issues that the county management team can address to improve their operations from a civil rights perspective.

A. Observations included: No observations were submitted by the community organizations that were contacted.

B. Corrective Actions
None

X. CIVIL RIGHTS COMPLIANCE PLAN REVIEW AND APPROVAL

The Santa Barbara Social Services Department Civil Rights Compliance Plan for the period February 29, 2016 to February 28, 2017, was received on February 29, 2016. It is approved as submitted.

XI. CONCLUSION

The CDSS reviewer found the Santa Barbara Social Services Department staff warm, welcoming, informative and very supportive. Thanks to Terrie Concellos, Civil Rights

Coordinator and special thanks to Mekala Manus for organizing the details of the review. Each District Office, staff was helpful with the facility reviews, case reviews, and computer assistance.

The CDSS found the Santa Barbara Social Services Department is in substantial compliance with CDSS Division 21 Regulations, and other applicable state and federal laws. County staff continues to reflect a commitment similar to that expressed by management with respect to ensuring access, assistance, and compliance.

The Santa Barbara Social Services Department must remedy the deficiencies identified in this report by taking corrective actions. A corrective action plan must be received by CDSS within 60 days of the date of the cover letter to this report; and the plan must include a schedule of all actions that will be taken to correct the deficiencies, and an indication of who will be responsible for implementing the corrective action.

It is our intent that this report be used to create a positive interaction between the county and CDSS in identifying and correcting compliance violations and to provide the county with an opportunity to implement corrective action to achieve compliance with Division 21 regulations. Civil Rights staff is available to provide technical assistance as requested.